

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

THE GENERAL CONVENTION OF THE  
NEW JERUSALEM IN THE UNITED  
STATES OF AMERICA, INC., THE  
MASSACHUSETTS ASSOCIATION OF  
THE NEW JERUSALEM  
(SWEDENBORGIAN), and GEORGE  
CHAPIN,

Plaintiffs,

v.

C.A. No. 04-10419-WGY

EDWARD MACKENZIE, THOMAS  
KENNEDY, BOSTON SOCIETY OF THE  
NEW JERUSALEM, INCORPORATED  
(SWEDENBORGIAN), and BOSTONVIEW  
CORPORATION

Defendants.

**DEFENDANTS' JOINT MOTION FOR  
ENTRY OF CONFIDENTIALITY ORDER**

For the reasons set forth in the accompanying memorandum of law, the Defendants, Boston Society of the New Jerusalem, Incorporated and Bostonview Corporation (the "Entity Defendants"), and Edward MacKenzie and Thomas Kennedy (the "Individual Defendants") hereby jointly move that this Court issue a confidentiality order, in the form set forth in Exhibit A, attached hereto, ordering the Plaintiffs to treat as confidential (a) all financial information, and (b) all Boston Society of the New Jerusalem, Inc., and its subsidiaries, internal documents, including membership records, produced in discovery in this action.

**REQUEST FOR ORAL ARGUMENT**

The Defendants request an opportunity for oral argument on this Motion.

EDWARD MACKENZIE and  
THOMAS KENNEDY,  
Defendants,

By their attorneys,

/s/ Nicholas B. Carter  
Howard M. Cooper (BBO #543842)  
Nicholas B. Carter (BBO #561147)  
TODD & WELD LLP  
28 State Street, 31st Floor  
Boston, MA 02109  
(617) 720-2626  
(617) 277-5777 fax

BOSTON SOCIETY OF THE NEW  
JERUSALEM, INCORPORATED and  
BOSTONVIEW CORPORATION  
Defendants,

By their attorneys,

/s/ Brian H. Lamkin  
Richard J. McCarthy (BBO #328600)  
Brian H. Lamkin (BBO #635688)  
Mary Patricia Cormier (BBO #635756)  
EDWARDS & ANGELL LLP  
101 Federal Street  
Boston, MA 02110  
(617) 439-4444  
(617) 439-4170 fax

**LOCAL RULES 7.1 AND 37.1 CERTIFICATION**

At various times in April 2004, each of the undersigned counsel for the Entity Defendants and the Individual Defendants, in a good faith attempt to narrow the areas of disagreement between the parties regarding the issues in this Motion, have contacted Plaintiffs' counsel,

Christopher J. Trombetta, by telephone, and requested that Plaintiffs agree to keep confidential certain documents obtained in discovery in the above-entitled action, including executing a confidentiality agreement with respect to certain documents and information received in discovery of this action. Mr. Trombetta declined these requests, but did agree to keep confidential all documents and information produced until the issue was decided by the Court..

/s/ Nicholas B. Carter\_\_\_\_\_  
Nicholas B. Carter (BBO #561147)

/s/ Richard J. McCarthy\_\_\_\_\_  
Richard J. McCarthy (BBO #328600)